

3. At the status conference on April 19, 2016, this Court set a deadline of May 31, 2016, for the filing of a motion for preliminary approval for both settlements. Docket Entry 344. This was subsequently reset, at the parties' request, to a filing deadline of June 23, 2016, to be noticed for presentment on June 29, 2016. Docket Entry 348.

4. The parties have since completed all confirmatory discovery, and continue to work diligently at completing the materials needed for the preliminary approval filing—including by resolving certain disputed matters at issue during a joint conference call with Judge Denlow held on June 22, 2016. Thus, while the parties had believed that the current deadline would afford sufficient time to reach agreement on any remaining items and prepare the materials necessary for the motion, they regret to inform the Court that they cannot do so in time for filing by June 23, 2016.

5. As it stands now, the parties are very close to completing and executing the formal settlement documents necessary to effectuate their agreement, and respectfully believe that a short, one-week extension to June 30, 2016, will be sufficient to have such materials finalized for filing. Movants also respectfully request that the existing June 29, 2016 presentment date be continued to July 6, 2016.

6. Movants file this motion in good faith, and not for purposes of delay or for any improper purpose.

WHEREFORE, Jennifer Ossola and Joetta Callentine and the American Express defendants respectfully request that the Court extend the date within which they may file their motions for preliminary approval of class settlement, until June 30, 2016, and continue the existing status/presentment date to July 6, 2016.

Respectfully submitted,

Dated: June 23, 2016

By: /s/ Daniel J. Marovitch

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CERTIFICATE OF SERVICE

I hereby certify that, on June 23, 2016, I caused the foregoing to be electronically filed with the Clerk of the United States District Court for the Northern District of Illinois using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Daniel J. Marovitch